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February 13, 2025

Via CM/ECF

Hon. Kenneth M. Karas, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Weiss v. Lefkowitz*, Case No. 7:24-cv-06046-KMK

Dear Judge Karas:

This firm represents Petitioner Sholam Weiss, Individually and as Custodian or Administrator for Abraham Weiss, Isaac Weiss, Joel Weiss, Boruch Weiss, Yoel Weiss, Chaim Weiss, Nachman Weiss, and Goldy Feig (“Petitioner”), in the above-referenced special proceeding seeking to compel arbitration. As the Court is aware, on August 20, 2024, Petitioner filed its motion to remand (the “Motion”) the instant proceeding to the court in which it was originally filed, the New York State Supreme Court, County of Rockland. [ECF Nos. 15–17] At that time, the Court, by Judge Halpern, had directed an expedited briefing schedule of the Motion. The Court’s Order, entered on August 13, 2024, directed Petitioner to file the Motion one week later and Respondents to respond one week after that, with no reply brief to be submitted. [ECF No. 12]

The Court recently scheduled oral arguments on the Motion to occur on March 12, 2025 [ECF No. 31], which was rescheduled to March 5, 2025, to accommodate a conflict of Respondents’ counsel. Because the Motion is no longer going to be decided on the accelerated schedule for which it had been initially scheduled and because Petitioner believes an opportunity to address the legal issues raised in Respondents’ submission will enhance the presentation of those issues to the Court, Petitioner respectfully requests leave to file, by February 24, 2025, a short reply to the motion, not to exceed five pages, in order to address the arguments and legal authority cited by Respondents in their opposition to the Motion.

I thank the Court for its time and consideration. Please do not hesitate to contact me should Your Honor have any questions or concerns.

Respectfully submitted,

By: /s/ Jeremy M. Doberman
Jeremy M. Doberman, Esq.

Cc: All counsel of record (via ECF)